

Exhibit B

From: [Brendan Ruddy](#)
To: [Micha Nandaraj Gallo](#); MDL3047COLEADFIRMS@LISTSERV.MOTLEYRICE.COM;
MDL3047PSCLEADERSHIP@LISTSERV.MOTLEYRICE.COM; SM.MDLAGLeads@coag.gov
Cc: [Geoffrey Drake](#); [Kristen Fournier](#); [TaCara Harris](#); [David Mattern](#); [Genet Hogan](#); [Brody, Steve](#); [Henson, Aaron](#);
[Kaplan, Lauren](#); [Hutton, Mattie](#); [Petrocelli, Daniel M.](#)
Subject: RE: MDL 3047 - Admin Motion to Relate CA AG TikTok Action (5:24-cv-7942)
Date: Thursday, November 14, 2024 12:54:51 PM
Attachments: [image001.png](#)

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Counsel,

I am counsel for the People of the State of California, plaintiff in *People of the State of California v. TikTok, Inc., et al.*, California Superior Court, County of Santa Clara, No. 24CV449203. At this time, based on your limited explanation for the bases of your proposed LR 3-12 motion, the People are inclined not to stipulate to the relief you seek. Among other reasons, as we informed counsel for defendants in the action on October 21, 2024, who are copied to this email, removal is improper because the federal court lacks subject-matter jurisdiction over this case. Accordingly, unnecessary motion practice before this Court, other than adjudicating remand and imposing costs and expenses on defendants for improper removal, would be a waste of judicial and party resources. Please let us know if you think it would be fruitful to meet and confer over any of these issues. We are happy to do so in person, virtually, or telephonically.

Thanks,

Brendan Ruddy | Deputy Attorney General | Consumer Protection
California Department of Justice | 455 Golden Gate Ave, 11th Fl, San Francisco, CA 94102
(415) 510-3854 | brendan.ruddy@doj.ca.gov

From: Micha Nandaraj Gallo <mnandarajgallo@kslaw.com>
Sent: Wednesday, November 13, 2024 3:10 PM
To: MDL3047COLEADFIRMS@LISTSERV.MOTLEYRICE.COM;
MDL3047PSCLEADERSHIP@LISTSERV.MOTLEYRICE.COM; SM.MDLAGLeads@coag.gov; Brendan Ruddy <Brendan.Ruddy@doj.ca.gov>
Cc: [Geoffrey Drake <GDrake@KSLAW.com>](mailto:GDrake@KSLAW.com); [Kristen Fournier <kfournier@kslaw.com>](mailto:kfournier@kslaw.com); [TaCara Harris <THarris@KSLAW.com>](mailto:THarris@KSLAW.com); [David Mattern <DMattern@KSLAW.com>](mailto:DMattern@KSLAW.com); [Genet Hogan <GHogan@KSLAW.com>](mailto:GHogan@KSLAW.com); [Brody, Steve <sbrody@omm.com>](mailto:sbrody@omm.com); [Henson, Aaron <ahenson@omm.com>](mailto:ahenson@omm.com)
Subject: MDL 3047 - Admin Motion to Relate CA AG TikTok Action (5:24-cv-7942)

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Counsel:

Defendants TikTok Inc., TikTok LLC, TikTok Ltd., ByteDance Inc., and ByteDance Ltd. plan to file an

administrative motion under Civil Local Rule 3-12 asking the Court to consider whether the MDL is related to an action that was recently removed to the Northern District Court of California from the Superior Court of California, County of Santa Clara: *The People of the State of California v. TikTok, Inc.*, No. 24CV449203. For reference, attached is the redacted complaint filed in that action. The cases are related under Civil Local Rule 3-12 because they involve certain of the same defendants and assert the same or similar factual allegations and legal theories. Moreover, because both cases involve the same or overlapping legal and factual issues, litigating the cases before different judges will result in unduly burdensome duplication of labor and expense and create the risk of conflicting results on those issues.

Pursuant to Civil Local Rule 7-11(a), **please advise whether Plaintiffs stipulate to this motion by 10 AM PT tomorrow so that we may include Plaintiffs' position in the motion we file.**

Best,
Micha

Micha Nandaraj Gallo

Associate

T: +1 404 572 2830 | E: mnandarajgallo@kslaw.com | [Bio](#) | [vCard](#)

King & Spalding LLP
1180 Peachtree Street, NE
Suite 1600
Atlanta, GA 30309



kslaw.com

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